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????????? 2022 — SC Adient Ltd & Co.Kg ??? Agen?ia Na?ional? de Administrare Fiscal?,
Agen?ia Na?ional? de Administrare Fiscal? — Direc?ia General? Regional? a Finan?elor Publice
Ploie?ti — Administra?ia Jude?ean? a Fina

(??????? C-533/22)

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Tribunalul Arge?

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?????????: SC Adient Ltd & Co.Kg

?????: Agen?ia Na?ional? de Administrare Fiscal?, Agen?ia Na?ional? de Administrare Fiscal? —
Direc?ia General? Regional? a Finan?elor Publice Ploie?ti — Administra?ia Jude?ean? a Fina

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1)

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????????????? ?????? (1) ??? ?? ????? 10 ??? 11 ??? ?????????????? ?????????? 282/2011
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2)

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3)

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?????, ??? ??? ?????? ???????;

4)

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??? ?????????? ????????, ??? ?? ???? 192?, ??????? ?', ??? ?????? 2006/112/??,
?????? ?? ?? ????? ?????? ??????? ?????? ?????????????? ??????[, ?????? ???] ??? ????? 11 ??? ??
????? 53, ?????????? 2, ??? ?????????? ?????? 282/2011 ??? ?? ??????? ??????
????????? ??? ??????? ???, ??? ?????? ??? ?? ??????? ?????????? ?????????? ?????????? ???
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?????: (i) ?????????? ??? ??????? ?? ??????? ?????? ?????? ?????? ??? ??????? ??????
??????, ??? ?? ?????????????? ?????? ??? ?????? ?????? ???, ?, ??? ??????????, ii)
????????? ??? ?????????? ??? ?? ???? ?? ?????? ?????? ?????? ???????, ??? ??
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5)

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282/2011 ?? ??????????? ?? ?? ?? ??????? ?? ??????? ?? ??????? ?? ??????? ?? ??;

6)

??? ?? ??????? ??? ?????? 53, ??????????? 2, ??? ?????????????? ??????????? 282/2011 ???
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7)

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(????????????? ??? ?????) ?????? ??? ??????????, ??? ?? ??? ????? ??? ?????????? ???
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«????????????» ??? ?????? ?, ?????? «????????????» ??? ???????, ?????????? ?? ???;
8)

?????????, ?? ??? ??????????, ?????? ?????????? ??? ??? ?????? ??? ?????? 2,
????????? 1, ????????'?, ??? ?????? ???, ??? ?? ?????????? ??? ?????????? ??? ?????? ???
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?? ??????? ??? ?????????? ??? ??????????, ? ?????? ?????? ?????????? ??? ??????????; ;

(1) ?????? 2006/112 ??? ??????????, ??? 28?? ?????????? 2006, ??????? ?? ?? ???
?????? ?????? ?????????????? ??? (?? 2006 L 347, ?. 1).

(2) ?????????? ?????????? (??) 282/2011 ??? ??????????, ??? 15?? ?????? 2011, ??? ??
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????????? ??? (?? 2011 L 77, ?. 1).